

United States District Court

MIDDLE DISTRICT OF ALABAMA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER: 2:06mj103-VPM

GENO PITTS

(Name and Address of Defendant)

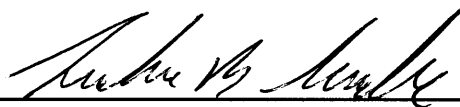
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 18, 2006, in Montgomery county and elsewhere within the Middle District of Alabama defendant(s) did, (Track Statutory Language of Offense)

Utter counterfeit obligations and dealt in counterfeit obligations or securities,
in violation of Title 18 United States Code, Section(s) 472 & 473, I further state that I am a(n)

Special Agent and that this complaint is based on the following facts:
Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant

Sworn to before me and subscribed in my presence,

October 17, 2006


Date

at Montgomery, Alabama

City and State

Vanzetta Penn McPherson, U.S. Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

- 1) I am a Special Agent with the United States Secret Service and have been so employed since January, 1997. In March, 2005, I was assigned as the Resident Agent to Montgomery, Alabama. Prior to this appointment, I was assigned to the Presidential Protection Division in Washington D.C. and Austin, Texas. Between 1997 and 2001, I was assigned to the Houston Area Fraud Taskforce where I was assigned to exclusively investigate matters of fraud. Prior to my appointment to the United States Secret Service, I was employed as a Police Officer with the Waco Police Department in Waco, Texas.
- 2) As a Special Agent of the United States Secret Service, I am currently responsible for the investigation of Federal offenses involving Counterfeit Currency in violation of Title 18 United States Code Sections 472 and 473. I have received training in how to conduct investigations of offenses relating to Counterfeit currency. The specialized training I have received includes various courses on the recovery of evidence and the detection of counterfeit documents, to include counterfeit Federal Reserve Notes.
- 3) This affidavit is being made in support of Criminal Complaint against Geno Montana Pitts.
- 4) The factual information contained in this application and affidavit is based upon my investigation and upon information provided to me orally and in a written statement by a suspect involved in the counterfeit scheme. It is also based on witness statements and on documentary evidence to include video surveillance of multiple transactions.
- 5) I have probable cause to believe that Title 18, United States Code, Section 472, Uttering Counterfeit Obligations and Section 473, Dealing in Counterfeit Obligations or Securities was violated by Geno Montana Pitts on several occasions.
- 6) Title 18, United States Code, Section 472 makes it a federal criminal offense for any person, with the intent to defraud, passes, utters, publishes, or sells, or attempts to pass, utter, publish, or sell or with like intent brings into the United States or keeps in possession or conceals any falsely made, forged, counterfeited, or altered obligation or other security of the United States.

Title 18, United States Code, Section 473 makes it a federal criminal offense for any person to buy, sell, exchange, transfer, receive, or deliver any false, forged, counterfeited, or altered obligation or other security of the United States, with the intent that the same be passed, published, or used as true and genuine.

LOCAL INVESTIGATION

- 7) On 8/21/06, I was received a CFT \$100 FRN, a recently appearing counterfeit note, from Kentucky Fried Chicken in Montgomery, Alabama. The note had simulated security features and had the same, poorly simulated, color shifting ink in the bottom right hand corner as other notes we had recently seen.
- 8) On the same date I traveled to Kentucky Fried Chicken (KFC), 6808 Atlanta Highway, Montgomery, Alabama, 36117, 334-396-7049. I spoke with Gena Evans regarding the source of the counterfeit note. She stated that several days after the first (2) CFT \$100 notes were passed, an employee, Demontez Lockett, attempted to get change for an additional (2) \$100 notes.
- 9) On 8/22/06, I received a call from Glenn Barnes, KFC Asset Protection. Barnes stated that the KFC store in question received another (2) Counterfeit \$100 notes during the overnight shift on 8/21/06. I asked Barnes if Demontez Lockett had worked that evening and he stated that he had.
- 10) Continuing on the same date, I interviewed Lockett after reading him his Miranda warnings. After explaining the situation to Lockett, Lockett confessed to having two more counterfeit \$100 notes in his vehicle. Lockett requested that we retrieve the notes that were in a small bag which was hanging from his vehicle rear view mirror. During an interview on the same date, Lockett related the following:

On or around 8/08/06, he was approached by a friend he knows only as "Geno". He stated that Geno showed him approximately \$1000 in CFT \$100 bills. Gino showed him that each CFT bill had security features in them and stated that he had a "guy" making them for him in Atlanta.

Approximately 1 week later, "Geno" asked Lockett to pass some of the counterfeit at his place of employment, Kentucky Fried Chicken. Lockett refused because he did not think they would pass, but suggested that "Geno" attempt to pass one. The same day, "Geno" successfully passed (1) CFT \$100 FRN while Lockett was working. Lockett watched this, but was not the employee who accepted the bill.

Around the same date, after "Geno's successful pass, Lockett exchanged (2) counterfeit \$100 notes at KFC by changing them out for genuine currency. Lockett then passed one at a local area Chevron Station in the area of South Blvd, Montgomery, Alabama. He could not remember the exact location.

Next, Lockett suggested "Geno" go back to the KFC and get change for (1) CFT \$100 bill. "Geno" again successfully accomplished this.

Within the next couple of days, Lockett purchased another (2) counterfeit \$100 notes from "Geno".

On 8/22/06, Demontez passed an additional (2) counterfeit \$100 notes at the KFC. These were the two that I received the call about on 8/22/06 from Glenn Barnes, KFC Asset Protection.

- 11) Continuing on 8/22/06, I received a call from the Birmingham Field Office of the U.S. Secret Service. SA Plemons stated that he had been contacted by Wachovia Bank with information that a Target Store in Montgomery, Alabama had recently received \$1700 in counterfeit \$100 FRNs. I contacted Wachovia Bank, Patricia Moore 205-667-5663, to obtain a description of the counterfeit notes. At the conclusion of our conversation, I was convinced that these were the same counterfeit notes I was currently investigating.
- 12) Video surveillance of the above two transactions on 8/18/06, record Demontez Lockett and two yet unidentified females making the purchases from Geno Pitts, who was working the register in question at Target at the time of the transaction.
- 13) Later, both of the above transactions were verified by Lockett to be the purchases he made with CFT currency given to him by Geno Pitts for the purpose of this transaction.
- 14) On the same date, Target Asset Protection identified Geno Pitts as being the subject that returned the items, purchased on 8/18/06 with counterfeit currency, to two different Target stores in Opelika, Alabama and East Point Georgia. Both transactions were recorded by store surveillance equipment.
- 15) On 8/24/06, Lockett provided a written statement regarding his involvement in this counterfeit scheme. Lockett related the following:

During the first part of August, 2006, Lockett and Pitts discussed the possibility of passing counterfeit currency at Lockett's place of employment, Kentucky Fried Chicken (KFC). Lockett later told Pitts that he did not think that the bills would pass. Pitts then held the bills up to the light and pointed out the bills simulated watermark, security strip and simulated color shifting ink.

To prove to Lockett that the counterfeit bills would pass, Pitts purchased food at KFC while Lockett watched. Later, Lockett passed (6) CFT \$100 FRN to KFC, (1) CFT \$100 FRN at a local area gas station and (2) CFT \$100 FRN to an unknown subject for change. When Lockett called Pitts to ask for more, Pitts told Lockett to come to his place of employment, Target, and they would discuss it. Pitts told Lockett to bring a friend that could help them pass counterfeit currency.

Once at Target, Lockett was told by Pitts that he wanted Lockett to purchase a number of items for Pitts with counterfeit currency at Target. After receiving the counterfeit currency from Pitts, \$1700.00 in CFT \$100 FRNs, Lockett purchased (2) X-Box 360 Video Game Systems, a home stereo system, (2) PSP Video Game

Systems, (2) bed comforters and miscellaneous other items. Lockett did this with the assistance of the two, yet unidentified, females who accompanied him to Target.

That same evening, Lockett met Pitts on Eastern Blvd to give Pitts the items Lockett purchased from Target earlier that day. Pitts told Lockett that he was going to return the items to two different Target locations so that he could get genuine currency.

- 16) On 8/25/06, I again met with Monica Banks, Target Asset Protection. Banks stated that since our last meeting, she had discovered several things regarding the activities of Geno Pitts. Items are detailed below:

On 8/11/06, Pitts used his employee discount at the Target Store in Morrow, Georgia, in an attempt to purchase an item with a Counterfeit \$100 FRN. When the employee discovered the bill to be counterfeit, Pitts retrieved the bill and left the store. This incident is recorded on the store surveillance system.

On 8/17/06, an unknown subject passed the same CFT \$100 at a Target Store in Buckhead, Georgia. This was not witnessed as the bill was discovered later.

On 8/18/06, Lockett and two unnamed females purchased several items to include (2) Play Stations and miscellaneous other items totaling \$687.42 at Target, Montgomery. These were purchased from Gino Pitts with CFT \$100 FRNs, reportedly given to Lockett by Pitts moments earlier for the purpose of this purchase.

Also on 8/18/06, Lockett purchased (2) Xbox Video Game Systems and (1) RCA Stereo System from Target Montgomery totaling \$987.97. These items were purchased from Gino Pitts with CFT \$100 FRNs reportedly given to Lockett by Pitts moments earlier for the purpose of this purchase.

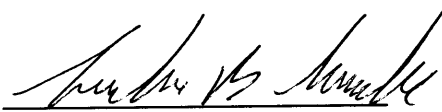
On 8/19/06, Pitts returned the items totaling \$687.42, purchased from Target-Montgomery on 8/18/06, at the Opelika Target Store using the original receipt from the purchase. This incident is recorded on the store surveillance system and Pitts is identified by store employees as being the person returning the items.

Also on 8/19/06, Pitts returned the additional items purchased from Target-Montgomery on 8/18/06, totaling \$987.00, at the Target Store in East Point, Georgia. This was also recorded on the store surveillance system. Pitts has been identified by store employees.

- 17) On 9/06/06, I again received a call from Monica Banks, Target Montgomery. Banks advised that Geno Pitts had just passed another CFT \$100 FRN in her store, while being recorded on surveillance equipment, and was still present. I advised that she call the Montgomery Police Department (MPD) and we would also be en route to her location.

Upon arrival by SA Fenwick and I, we found that Pitts had fought several employees in an effort to escape, then ran into an adjacent wooded area. Montgomery Police were already on the scene and were attempting to locate Pitts. After attempting to locate Pitts for some time, the search was discontinued. Pitts was not found until the following date.

- 18) On 9/10/06, Geno Pitts was located at Alabama State University. He refused to be interviewed.



Leighton B. Greenlee Affiant
Special Agent, United States Secret Service

Sworn to and subscribed by
me this 17th day of October, 2006



VANZETTA PENN MCPHERSON
UNITED STATES MAGISTRATE JUDGE